

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRIDGET MECHETNER – CESARIO,)	
)	
Plaintiff,)	Case No.: 08 CV 0021
)	
v.)	Judge Ruben Castillo
)	Magistrate Judge Brown
CHIEF OF CORRECTIONS JENNIFER)	
WITHERSPOON, et al.,)	
)	
Defendants.)	

INITIAL JOINT STATUS REPORT

Plaintiff, BRIDGET MECHETNER – CESARIO, by her attorney, PATRICK J. CULLINAN, and, Defendants, CHIEF OF CORRECTIONS JENNIFER WITHERSPOON, et al., by their attorney, DANIEL P. FIELD, for their Initial Joint Status Report state as follows:

A. Nature of the Case

1. Plaintiff asserts that the Defendants deprived her of her civil rights and endangered her health by their unlawful denial of necessary medical and psychiatric care; their wrongful imposition of conditions of lock down upon her; and their wrongful housing of Plaintiff with other inmates who were threatening her and thereby posing a risk to her.

2. Jurisdiction is conferred on this Court by existence of questions arising under a particular statute, to wit, 42 U.S.C. Section 1983.

3. Plaintiff seeks compensatory and punitive damages, and costs and attorneys' fees.

4. The last names of Defendants, ROXANNE DOE and of JOHN DOE are currently unknown and as such they have not yet been served.

5. The legal issues involve whether the Defendants deprived Plaintiff of her civil rights, and caused her personal injury and/or damages, so as to entitle Plaintiff to compensatory damages and to punitive damages.

6. The factual issues involve whether the Defendants denied Plaintiff timely medical and psychiatric treatment; made false recordings in Plaintiff's medical records; denied Plaintiff medication that had previously been prescribed for her for an unreasonable period of time; improperly classified Plaintiff as requiring placement in lockdown resulting in her being placed in lockdown; housed Plaintiff in an area of the jail which presented her with a danger of assault by other inmates; and whether any of the foregoing caused injury and/or damages to Plaintiff.

B. Draft Scheduling Order

7. The parties will exchange by September 24, 2008 the information required by Fed. R. Civ. P. 26(a)(1), and all discovery is to be completed by April 24, 2009.

8. A maximum of 25 interrogatories will be allowed by each party to other parties.

9. Plaintiff is allowed 10 depositions, and Defendants are allowed 10 depositions, with each deposition limited to a maximum of 3 hours unless extended by agreement of parties.

10. Expert reports under Rule 26(a)(2) are to be produced by Plaintiff by December 24, 2008, and by Defendants by February 24, 2009.

11. Plaintiff's experts are to be produced for deposition by January 24, 2009 and Defendants' experts are to be produced for deposition by March 24, 2009.

12. The last date for the parties to seek leave of court to join additional parties and to amend the pleadings is November 22, 2008.

13. The last date for the filing of all potentially dispositive motions is May 24, 2009.

14. Pretrial disclosures under Fed. R. Civ. P. 26(a)(3) shall be governed by separate

order.

C. Trial Status

15. Plaintiff has requested a trial by jury and the probable length of trial is 4 – 5 days.

D. Consent to Proceed Before a Magistrate Judge

16. The parties do not consent to proceed before a Magistrate Judge.

E. Settlement Status

17. Counsel for the parties have discussed the possibility of settlement of this matter.

However, to date no settlement demands or settlement offers have been exchanged by the parties.

BRIDGET MECHETNER – CESARIO

/s/: Patrick J. Cullinan

Patrick J. Cullinan

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**CHIEF OF CORRECTIONS JENNIFER
WITHERSPOON, LIEUTENANT WARD,
OFFICER JENNIFER BUCKINGHAM,
OFFICER STOVALL, OFFICER KARAWITZ,
LIEUTENANT MARCADO, OFFICER
MITCHELL, OFFICER QUICK, SERGEANT
DAVIS, SERGEANT SMITH**

/s/: Daniel P. Field

Daniel P. Field

SCARIANO, HIMES AND PETRARCA

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CERTIFICATE OF FILING

Patrick J. Cullinan, Attorney for Plaintiff, certifies that this Initial Joint Status Report was filed electronically this 19th day of August 2008 via the CM/ECF filing system.

/s/: Patrick J. Cullinan